

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:) **Chapter 11**
WELLPATH HOLDINGS, INC., et al.,)
) **Case No. 24-90533 (ARP)**
Debtors.)
) **(Jointly Administered)**
)

**NOTICE OF WITHDRAWAL OF OBJECTION OF DOMINION ENERGY SOUTH
CAROLINA, INC. AND SAN DIEGO GAS AND ELECTRIC COMPANY TO THE
DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER (I) APPROVING
THE DEBTORS' PROPOSED ADEQUATE ASSURANCE OF PAYMENT FOR
FUTURE UTILITY SERVICES, (II) PROHIBITING UTILITY PROVIDERS FROM
ALTERING, REFUSING, OR DISCONTINUING SERVICES, (III) APPROVING THE
DEBTORS' PROPOSED PROCEDURES FOR RESOLVING ADEQUATE ASSURANCE
REQUESTS, AND (IV) GRANTING RELATED RELIEF**

Dominion Energy South Carolina, Inc. and San Diego Gas and Electric Company (collectively, the “Utilities”), hereby withdraw their *Objection* (Docket No. 226) to the *Debtors’ Emergency Motion for Entry of an Order (I) Approving the Debtors’ Proposed Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers From Altering, Refusing, or Discontinuing Services, (III) Approving the Debtors’ Proposed Procedures for Resolving Adequate Assurance Requests, and (IV) Granting Related Relief* (Docket No. 14), pursuant to a settlement between the Utilities and the Debtors.

Dated: December 10, 2024

/s/ Weldon L. Moore, III
Weldon L. Moore III, Esq. (TX 14380500)
Sussman & Moore, LLP
2911 Turtle Creek Blvd., Suite 1100
Dallas, Texas 75219
Telephone: (214) 378-8270
Facsimile: (214) 378-8290
E-mail: wmoore@csmlaw.net

and

Russell R. Johnson III, Esq.
Virginia State Bar No. 31468
John M. Craig
Virginia State Bar No. 32977
Law Firm of Russell R. Johnson III, PLC
2258 Wheatlands Drive
Manakin-Sabot, Virginia 23103
Telephone: (804) 749-8861
Email: russell@russelljohnsonlawfirm.com,
john@russelljohnsonlawfirm.com

*Co-Counsel for Dominion Energy South Carolina, Inc. and
San Diego Gas and Electric Company*

CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2024, a true and correct copy of the foregoing *Notice of Withdrawal* was served via the Court's CM/ECF electronic notification system on all parties requesting same, and via email to the parties listed below.

Marcus A. Helt
MCDERMOTT WILL & EMERY LLP
2501 N. Harwood Street, Suite 1900
Dallas, Texas 75201-1664
Email: mhelt@mwe.com
Debtors' Counsel

Felicia Gerber Perlman
Bradley T. Giordano
Jake Jumbeck
Carole Wurzelbacher
Carmen Dingman
MCDERMOTT WILL & EMERY LLP
444 West Lake Street, Suite 4000
Chicago, Illinois 60606-0029
Email: fperlman@mwe.com, bgiordano@mwe.com, jjumbeck@mwe.com,
cwurzelbacher@mwe.com, cdingman@mwe.com
Debtors' Counsel

Steven Z. Szanzer
MCDERMOTT WILL & EMERY LLP
One Vanderbilt Avenue
New York, New York 10017
Email: sszanzer@mwe.com
Debtors' Counsel

Andrew Jimenez
Jana Smith Whitworth
U.S. Department of Justice
515 Rusk Street, Suite 3516
Houston, Texas 77002
Email: andrew.jimenez@usdoj.gov, jana.whitworth@usdoj.gov

/s/ Weldon L. Moore, III
Weldon L. Moore III, Esq.